

EXHIBIT 2



William L. Carr
215-988-2857 Direct
215-988-2757 Fax
William.Carr@dbr.com

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Law Offices

One Logan Square
Suite 2000
Philadelphia, PA
19103-6996

215-988-2700
215-988-2757 fax
www.drinkerbiddle.com

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BY EMAIL

Charles L. Becker
Kline & Specter, PC
1525 Locust Street, 19th Floor
Philadelphia, PA 19102
chip.becker@klinespecter.com

Re: *Beltz v. Ethicon, Inc.*, June Term 2013, No. 3835

Dear Chip:

As you know, on September 10, 2019, Ethicon paid the *Beltz* judgment in full with interest by wire transfer to your firm. I reached out to you by email dated September 12 when Ethicon realized the 5% Common Benefit Fund assessment had not been withheld from the wire transfer, and I requested that your firm remit the 5% assessment directly to the to the Fund and provide proof of payment to Butler Snow. You responded that you understood.

On September 26, I received a copy of a letter dated September 13 from your partner Lee Balefsky to Henry Garrard. It was then that I learned that Kline & Specter did not remit the 5% assessment as requested by Ethicon but that it instead put the assessment into an escrow account under Kline & Specter's control. I understand that your firm now refuses to remit the assessment to the Fund at this time.

I write again to demand that the 5% assessment inadvertently included in the wire transfer on September 10 that is currently being held by Kline & Specter be remitted by Kline & Specter to the MDL Common Benefit Fund immediately.

Thank you for your prompt attention to this matter.

Very truly yours,

William L. Carr

WLC/tsm